

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

2014 DEC -5 PM 2:16

CLERK'S OFFICE
AT BALTIMORE

BY KR DEPUTY

RICHARD EDWARD HOWE *

817 CHAPEL FARM DRIVE

EASTON, MD. 21601 *

(Full name and address of the plaintiff)

Plaintiff(s)

WDQ14 CV 3800

vs. *

Civil No.: _____
(Leave blank. To be filled in by Court.)

CITY OF BALTIMORE 200 HOLIDAY STREET
BALTIMORE, MD. 21201

KENNY LAW GROUP 11426 YORK ROAD *
1ST FLOOR
COLLEYSVILLE, MARYLAND 21030

STEFAN ADES - LAW OFFICE UNKNOWN *
ADDRESS AT TIME OF FILING

(Full name and address of the defendant(s))

Defendant(s)

COMPLAINT

1. Jurisdiction in this case is based on:

- ☐ Diversity (none of the defendants are residents of the state where plaintiff is a resident)
- ☒ Federal question (suit is based upon a federal statute or provision of the United States Constitution) FRAUDULENT BILLING WAS SENT THROUGH THE U.S. POSTAL SYSTEM
- ☐ Other (explain) _____

2. The facts of this case are:

IN 2009, I, RICHARD HOUCK, HAD THE WATER SERVICE
TURNUED OFF AT MY PROPERTIES AT 3028 JANICE AVE AND 2611 NORTSHIRE
DRIVE, BOTH IN BALTIMORE CITY, ZIP CODE 21230. EVEN THROUGH
THE SERVICE WAS TURNED OFF I CONTINUED TO BE BILLED PERIODICALLY
FOR THE WATER AND WASTEWATER CHARGES. SINCE THE CITY OF BALTIMORE
COLLECTS THE BAY RESTORATION TAX AND, NOW, THE RAIN TAX, I EXPECT
THAT TO PAY THOSE CHARGES, NOT FOR WATER AND WASTEWATER
CHARGES (FEES) THAT I HAVE NOT BELIEVED^{AND DO} NOT WANT. A FEE
IS A CHOICE OPTION. THE CITY OF BALTIMORE HAS MADE THOSE FEES
INTO PROPERTY TAXES: CHARGING ME, THE PROPERTY OWNER FEES
FOR PROPERTIES THAT I DO NOT WANT (NOT AT THIS TIME). I INFORMED THE MAYOR'S OFFICE
OF MY COMPLAINT AND THE OFFICE OF THE DIRECTOR OF PUBLIC WORKS OVER
TWO YEARS AGO AND NOTHING HAS BEEN DONE TO CORRECT THE CHARGES.
THE CHARGES HAVE ACCRUED TO OVER \$800 ON BOTH PROPERTIES
AND THE PROPERTIES WERE AUCTIONED AT TAX SALE. I WARNED
THE DIRECTOR OF PUBLIC WORKS ABOUT THE TAX LIEN THREAT
TO MY PROPERTIES IN A LETTER IN MARCH 2012 AND THAT THE LOSS
FOR THESE FRAUDULENT CHARGES COULD EXCEED \$100,000. A FORENSIC
AUDIT OF THE WATER ACCOUNTS MAY, ACTUALLY, SHOW THAT I HAVE A CREDIT
TO MY ACCOUNTS. THERE IS AN ADDITIONAL CHARGE TO MY ACCOUNTS
OF LESS THAN \$200 EACH FOR INTEREST ON PROPERTY TAXES I SHOULD NOT
OWE THAT EITHER. WHEN MY PROPERTIES WERE ASSESSED IN 2012, THE
ORIGINAL ASSESSMENTS FOR MY PROPERTIES WERE OVER \$100,000 FOR
EACH OF THE THREE. MARKET VALUE (MEAN) THAT I CALCULATED AND ZILLOW HAD MY
PROPERTIES VALUED IN THE MID \$50,000'S. I DID THE CALCULATIONS AND
CAN EASILY SAY THAT THE ORIGINAL APPRAISALS WERE FRAUDULENT. MY FRAUD
LIMIT WAS \$3,000. I.E. ANYTHING ABOVE THAT NUMBER WAS FRAUDULENT.
THE STATE APPRAISER'S OFFICE RETURNED THREE REAPPRAISALS OF ABOUT \$70,000.
(OVER)

THE ODDS OF RELIEVING THREE APPRAISALS VALUED AT \$70,000 IN THAT MARKET CASE 1:14-cv-03800-WDC Document 1 Filed 12/05/14 Page 3 of 4
LEVEL WAS SENT APPRAISALS IN THE \$63,000. BETTER, BUT THE ODDS OF RELIEVING THREE \$63,000 APPRAISALS IN A \$54,000 MARKET WERE 1 IN 71.

IN REALITY, I WAS ALWAYS ARGUING THAT MY PROPERTIES WERE AVERAGE FOR THE NEIGHBORHOOD AGAINST FRAUDULENTLY HIGH APPRAISALS AND AT EACH STEP ALL OF THE APPRAISALS WERE JUST "SPLIT THE DIFFERENCE."

MEANWHILE, THE CITY WAS CHARGING ME INTEREST ON THE EVENTUAL APPRAISED VALUE ~~IN THE~~ FROM OCTOBER, 1 WHILE I CHALLENGED THEIR FRAUDULENT APPRAISALS. I KNOW THERE IS A RULE (FEDERALLY) AGAINST CHARGING INTEREST ON DISPUTED CHARGES. SO, I SHOULD NOT HAVE BEEN CHARGED ANY ^{INTEREST} ~~THING~~ FOR MY TAXES. MY APPEALS WERE EVENTUALLY SETTLED IN TAX COURT. EVENTUALLY, ONE OF MY PROPERTIES RECEIVED A APPRAISAL OF \$53,000. THE TAX COURT RULING WAS IN JUNE. I, ACTUALLY, PAID MY PROPERTY TAXBILLS BEFORE JUNE. IT TOOK ALMOST A YEAR TO GET A JUST APPRAISAL FOR MY PROPERTIES. THERE ARE PROBABLY HUNDREDS OF LAKELAND/HOLLINSWOOD PROPERTY OWNERS WHO ACCEPTED THOSE FRAUDULENT \$100,000 APPRAISALS AND ARE PAYING OVER \$1,000 A YEAR IN TAXES THAT THEY SHOULD NOT


ALL IN ALL, IF YOU DO NOT WANT WATER AT YOUR HOUSE, YOU SHOULD NOT HAVE TO PAY FOR IT. THE CITY OF BALTIMORE CHARGES FOR IT, ANYWAY. ONE THE FEDERAL AND STATE GOVERNMENTS CAN TAX ITS CITIZENS. THE CITY OF BALTIMORE IS MAKING ITS WATER AND SEWER SERVICES PROPERTY TAXES. IT CANNOT. CAN A LOCAL OR STATE GOVERNMENT FORCE ITS PEOPLE TO BUY SOMETHING. NO. IN FACT, THE OBAMA CASE CASE RAISED QUESTIONS AS TO WHETHER THE FEDERAL GOVERNMENT CAN COMPEL ITS CITIZENS TO BUY SOMETHING. ALL CHARGES THAT LEAD TO THE TAX SALE OF MY PROPERTIES WERE FRAUDULENT OR THE RESULT OF CHALLENGING FRAUD BY THE CITY OF BALTIMORE. FORCING ME TO PAY THE CHARGES BY THE CITY OF BALTIMORE IS EXTORTION.

3. The relief I want the court to order is:

- ☒ Damages in the amount of: 116,000 FOR THE VALUE OF MY TWO PROPERTIES. TEN TIMES
THE ACTUAL CHARGES FOR PUNITIVE DAMAGES, TEN TIMES PROPERTY VALUE IF
CURRENT CHARGES 3,010 EST. UNKNOWN LEGAL. PROPERTIES ARE LOST (APPRAISED
☒ An injunction ordering: NO FORECLOSURE PROCEEDINGS AND CHARGES AGAINST (VALUE)
MY TWO PROPERTIES. FORFEITURE OF ALL MONIES, FEES, AND SERVICES THAT (TAX)
STEFAN ADES AND KENNY LAW GROUP HAVE PUT INTO THIS MATTER.
☒ Other (explain): FORENSIC AUDIT OF MY TWO WATER BILL ACCOUNTS.

DECEMBER 5, 2014

(Date)



(Signature)

RICHARD E. HOVACK

817 CHAPPEL FORM DRIVE

EDSTON, MD 21601

(410) 693-1558

(Printed name, address and phone number of
Plaintiff)

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